

## REMARKS

Claims 1-18 and 20 are pending. The Examiner's reconsideration of the objections and rejections is respectfully requested in view of the amendments and remarks.

Claims 1-18 have been rejected under 35 U.S.C. 102(b) as being anticipated by Bellegarda (USPN 5,644,652). The Examiner stated essentially that Bellegarda teaches or suggests all the limitations of Claims 1-18.

Claims 1 and 18 claim, *inter alia*, "recording at least one trace of at least one instance of a procedure; simultaneously performing an alignment and generalization of the at least one trace; and generating the one or more computer-executable procedures consistent with the alignment and generalization."

Bellegarda teaches a system for automatic handwriting recognition using derived statistical models (see Abstract). Bellegarda does not teach "simultaneously performing an alignment and generalization of the at least one trace; and generating the one or more computer-executable procedures consistent with the alignment and generalization" as claimed in Claims 1 and 18. Bellegarda teaches the derivation of a statistical model from different handwriting samples (see col. 4, lines 10-31). The derivation of a model is not analogous to generating a computer-executable procedure. For example, a model is not useful without a procedure. Further, the procedure of Bellegard is not changed by different models; rather the models are merely plugged into the procedure for determining a handwriting match. Thus, it cannot be said that the models themselves are procedures – they perform no function standing alone, and fail to change the matching procedure which uses the models. That is, the matching procedures operate the same regardless of model. Therefore, Bellegarda does not teach methods for generating procedures.

Thus, Bellegarda fails to teach, “generating the one or more computer-executable procedures consistent with the alignment and generalization” as claimed in Claims 1 and 18.

Claims 1 and 18 are believed to be allowable for additional reasons.

Bellegarda teaches a system for automatic handwriting recognition using derived statistical models (see Abstract). Bellegarda does not teach “recording at least one trace of at least one instance of a procedure” as claimed in Claims 1 and 18. Bellegarda acts of input handwriting (see FIG. 4). Handwriting input to a system is not analogous to “recording at least one trace of at least one instance of a procedure” as claimed in Claims 1 and 18. For example, a written letter is not a procedure. At the very most, a written letter is a result of a procedure. A procedure is a way of doing something, whereas a written letter is a result of a procedure. Thus, Bellegarda is not concerned with recording a trace of a procedure, but rather analyzing a thing.

For at least the foregoing reasons, Bellegarda fails to teach all the limitations of Claims 1 and 18.

Claims 2-17 depend from Claim 1. The dependent claims are believed to be allowable for at least the reasons given for Claim 1. Reconsideration of the rejection is respectfully requested.

Claim 20 has been rejected under 35 USC 103(a) as being unpatentable over Bellegarda. The Examiner stated essentially that Bellegarda teaches or suggests all the limitations of Claim 20.

Claim 20 claims, *inter alia*, “recording at least one trace of user actions that change the state of the computer system; ... and generating the one or more computer-executable procedures executable by the computer system consistent with a selected generalized and aligned user action.”


Bellegarda teaches a system for automatic handwriting recognition using derived statistical models (see Abstract). Bellegarda does not teach or suggest, “recording at least one trace of user actions that change the state of the computer system; ... and generating the one or more computer-executable procedures executable by the computer system consistent with a selected generalized and aligned user action” as claimed in Claim 20.

Similar to Claims 1 and 18, the derivation of a model is not analogous to generating the one or more computer-executable procedures executable by the computer system, essentially as claimed in Claim 20. For example, a model is not useful without a procedure. Further, Bellegarda acts on input handwriting (see FIG. 4). Handwriting input to a system is not analogous to “recording at least one trace of user actions that change the state of the computer system” as claimed in Claim 20. Therefore, Bellegarda does not teach or suggest “recording at least one trace of user actions that change the state of the computer system; ... and generating the one or more computer-executable procedures executable by the computer system consistent with a selected generalized and aligned user action” as claimed in Claim 20. Thus, Claim 20 is believed to be in condition for allowance.

For the forgoing reasons, the present application, including Claims 1-18 and 20, is believed to be in condition for allowance. The Examiner's early and favorable action is respectfully urged.

Respectfully submitted,

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